REMARKS

Claims 1-49 were pending and presented for examination. In an Office Action dated August 4, 2008, claims 1-49 were rejected. Claim 1 is amended. Claims 1-49 are pending upon entry of this amendment. In view of the Amendments herein and the Remarks that follow, Applicants respectfully request that Examiner reconsider all outstanding rejections and withdraw them.

Response to Rejection Under 35 USC 103(a)

Claims 1-4, 6, 12, 14, 29-32, 38, and 40

In the 3rd paragraph of the Office Action, claims 1-4, 6, 12, 14, 29-32, 38, and 40 have been rejected under U.S.C. 103(a) as allegedly being unpatentable over Sugiyama (US Patent No. 5,633,723) in view of Ishikawa (US Patent No. 5,987,226). This rejection is respectfully traversed.

As amended, claim 1 recites:

A system for printing time-based media, the system comprising:

a media processing system for executing a time-based media processing task for determining an electronic representation of the time-based media wherein the media processing system comprises a first portion with a first processing speed that resides at least in part on a multimedia printer and a second portion with a second processing speed that resides at least in part on an external media processing device; and

a resource allocation module for **allocating the time-based media processing task between the first portion and the second portion based at least in part on a comparison of the first processing speed and the second processing speed**;

an interface within the multimedia printer for receiving time-based media from an external source and being communicatively coupled to send the time-based media to the media processing system; and

an electronic output system within the multimedia printer in communication with the media processing system to receive the electronic representation, the

electronic output system producing a corresponding electronic output from the electronic representation of the time-based media.

Thus, claim 1 recites a printer that includes "a resource allocation module for allocating the time-based media processing task between the first portion and the second portion based at least in part on a comparison of the first processing speed and the second processing speed." Allocating a processing task based on a comparison of respective processing speeds of various portions of a media processing system enhances the system's ability to efficiently process time-based media. Support for the amended claim is found throughout the specification including at paragraph 53 and Figure 7.

These aspects of the claimed invention are not disclosed or suggested by the cited references, considered alone or in the combination proposed by the Examiner. As a preliminary matter, the Examiner admits that Sugiyama does not disclose this element. Office Action dated August 4, 2008, p. 3 ("Office Action" herein).

Ishikawa does not remedy the deficiencies of Sugiyama. Ishikawa merely describes a printing system including a printer (*See* Ishikawa, FIG. 1, element 2) and a plurality of processors (*See* Ishikawa, FIG. 1, elements 1, 1', 1"). However, the printer of Ishikawa does not allocate a time-based media processing task between portions of a media processing system based at least in part on a comparison of processing speeds. At best, Ishikawa's printer divides a rasterization task (*See* Ishikawa, col. 3, lines 16-39) between processors based on which processors include a *required processing function* for the printing job (*See* Ishikawa, col. 3, lines 41-67). Ishikawa does not consider the processing speed of a processor when dividing the rasterization task between processors. Hence, Ishikawa also does not disclose or suggest at least the claimed feature of a printer including "a resource allocation module for allocating the time-based media processing task between the first

portion and the second portion based at least in part on a comparison of the first processing

speed and the second processing speed."

Applicants note some potential confusion regarding the term "resource allocation

module" as claimed. Although Ishikawa refers to the required processing functions as

resources, a *resource* in Ishikawa does not represent a processing task, but rather a

capability to perform part of the rasterization task (*See* Ishikawa, col. 3, lines 39-55).

Hence, a transfer of a *resource* in Ishikawa (*See* Ishikawa, col. 7, line 57 to col. 8, line 19) is

a transfer of a processing capability and does not disclose an allocation of a time-based

media processing task. In contrast, the claimed "resource" represents a portion of a media

processing system. Hence, the claimed resource allocation module does not divide or

transfer resources, but rather allocates a processing task between resources. Applicants note

that although claims are to be read according to the broadest reasonable interpretation, that

interpretation must be consistent with the specification. MPEP 2111.

In a response filed May 6, 2008, Applicants asserted that Ishikawa does not divide a

time-based media processing task between a first portion of a media processing system

residing the multimedia printer and a second portion of the media processing system residing

in an external system. To the contrary, Ishikawa divides a rasterization task consisting of

obtaining picture element information for printing based upon a source file. The source file

is not time-based media, and the rasterization task does not constitute a time-based media

processing task. In response, the Examiner alleges that Ishikawa's discussion of a *time mode*

(*See* Ishikawa, col. 4, lines 7-9) discloses allocating a time-based media processing task.

Applicants respectfully disagree. The time mode is merely one of several possible *transfer*

modes used by Ishikawa pass data between processors (*See* Ishikawa, col. 4, lines 1-9 and

col. 5, 1-9 and col. 11, lines 13-14). Ishikawa does not "divide" the time-mode, but rather uses the time mode as a data transfer method after dividing the rasterization task. As the time mode is merely a data transfer method, its description does disclose **time-based media** or allocating a **processing task** for **time-based media**. Accordingly, Ishikawa does not disclose or suggest at least the claimed feature of a printer including "a resource allocation module for allocating the **time-based media processing task** between the first portion and the second portion based at least in part on a comparison of the first processing speed and the second processing speed."

Although Sugiyama receives time-based media, Sugiyama only discloses executing a function on individual frames of the video such as printing or deleting a single frame (*See* Sugiyama, col. 6, lines 19-30). Sugiyama does not disclose performing any **time-based media processing task**. Therefore, even if Ishikawa and Sugiyama could be combined, the combination still does not disclose or suggest **allocating a time-based media processing task**, as claimed.

Thus, the deficient disclosures of Sugiyama and Ishikawa do not disclose or suggest every claimed element, and thus fail to establish even a *prima facie* basis from which a proper determination of obviousness under 35 U.S.C. § 103(a) can be made.

For at least the reasons above, claim 1 is patentable over Sugiyama and Ishikawa, alone or in any combination. Dependent claims 2-4, 6, 12, 14, 29-32, 38, and 40 each incorporate all the limitations of claim 1 and are patentable over the cited references for at least the same reasons.

Claims 5, 7-11, 13, 15-28, 33-37, 39, and 41-49

The remaining dependent claims 5, 7-11, 13, 15-28, 33-37, 39, and 41-49 have further been rejected under U.S.C. 103(a) as allegedly being unpatentable over Sugiyama and Ishikawa, further in view of U.S. Patent No. 6,167,033 to Chang; U.S. Patent Application Publication 2003/0220988 A1 to Hymel; U.S. Patent Application Publication No. 2002/0010641 A1 to Stevens; U.S. Patent No. 5,170,935 to Federspiel; U.S. Patent No. 6,118,888 to Chino; U.S. Patent No. 6,308,887 to Korman; U.S. Patent No. 5,270,989 to Kimura; U.S. Patent No. 5,136,363 to Takemasa; and U.S. Patent No. 6,000,030 to Steinberg.

The additional cited references all fail to disclose or suggest the limitations shown above to be absent from Sugiyama and Ishikawa discussed above, alone or in combination; the Examiner does not allege that they do so. Therefore, dependent claims 5, 7-11, 13, 15-28, 33-37, 39, and 41-49 are patentable over all of the references cited above, taken alone or in any combination.

Conclusion

In sum, Applicants respectfully submit that claims 1-49, as presented herein, are patentably distinguishable over the cited references. Therefore, Applicants request reconsideration of the rejections to these claims and request allowance of them.

In addition, Applicants respectfully invite Examiner to contact Applicants'
representative at the number provided below if Examiner believes it will help expedite
furtherance of this application.

Respectfully Submitted,
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